



Matthew J. Sinkman  
Counsel

Gibbons P.C.  
One Pennsylvania Plaza, 37th Floor  
New York, NY 10119-3701  
Direct: (212) 613-2011  
Fax: (212) 554-9603  
[msinkman@gibbonslaw.com](mailto:msinkman@gibbonslaw.com)

December 24, 2022

**VIA CM/ECF**

Special Master Thomas P. Scrivo, Esq.  
O'Toole Scrivo, LLC  
14 Village Park Road  
Cedar Grove, New Jersey 07009  
[tscrivo@oslaw.com](mailto:tscrivo@oslaw.com)

**Re: *Occidental Chemical Corp. v. 21st Century Fox America, Inc. et al.*  
Docket No. 2:18-cv-11273-MCA-LDW**

Dear Special Master Scrivo:

We represent Defendant MI Holdings, Inc. ("MIH") in the above-captioned matter. I write to request a short extension of time and enlargement of the page limit to respond to the letter-motion by Plaintiff Occidental Chemical Corporation ("OCC") seeking protection from the Federal Rule of Civil Procedure 30(b)(6) deposition notices served upon it by the Small Parties Group ("SPG"). *See* ECF No. 2227 (OCC's motion).

Given the scope and significance of the issues raised in OCC's motion and the holiday season, MIH requests an extension until **January 6, 2023** to respond to OCC's motion. MIH also requests a limit of **10 pages**, single-spaced, to respond to the motion.

I understand that the Special Master has granted a similar request by the SPG. *See* ECF No. 2230. While MIH is a member of the SPG, MIH plans to separately oppose OCC's motion to highlight issues of critical importance to MIH and to provide MIH's unique perspective on arguments in OCC's motion. I have contacted counsel for OCC about MIH's request, but I have not yet received a response.

Thank you in advance for your attention to this matter.

Respectfully submitted,

/s/ *Matthew J. Sinkman*

\_\_\_\_\_  
Matthew J. Sinkman  
Counsel

cc: All counsel of record